



Indiana Department of Education

SUPPORTING STUDENT SUCCESS

November 19, 2009

Dr. Stephen Daeschner, Superintendent
Greater Clark County Schools #1010
2112 Utica-Sellersburg Road
Jeffersonville, IN 47130-8506

Dear Dr. Daeschner:

On October 14, 2009, the Indiana Department of Education's (IDOE) Title I monitoring team commenced an on-site monitoring review of Greater Clark County School's administration of Title I, Part A and Title II, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a report based upon those reviews.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities (described in the attached report) to verify compliance with 1) the programmatic requirements of Title I, Part A and Title II, Part A; and 2) the fiscal requirements that must be followed by recipients of Title I, Part A and Title II, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **Greater Clark County Schools is responsible for taking appropriate action to remedy compliance deficiencies**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer-term measures are necessary, Greater Clark County Schools must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance as appropriate.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting Greater Clark County Schools with improving the delivery of Title I services.

Sincerely,

Ms. Teresa Neely, Title I Coordinator
Office of Title I Academic Support
Indiana Department of Education

cc: Ms. Kathy Gilbert, Title I Program Administrator
Greater Clark County Schools #1010

Ms. Amy Schellenberg, Title II Administrator
Greater Clark County Schools #1010

Ms. Lee Ann Kwiatkowski, Director
Division of Differentiated Learning
Indiana Department of Education

**Indiana Department of Education
Title I, Part A Monitoring**

District: Greater Clark County Schools

Monitoring Team: Cindy Hurst, Teresa Neely, Hazel Beasley, Nicole Nussbaum and Liz Harmon

Background Information

The Indiana Department of Education (IDOE) commenced on-site monitoring of Greater Clark County Schools on October 14, 2009. The purpose of these monitoring visits was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title I, Part A, Title II, Part A, and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic	Statutory Citation
1) Compliance with professional qualification requirements for teachers and paraprofessionals; compliance with comparability requirement	NCLB §1111(h)(6)(A) NCLB §1112(c)(1)(L) NCLB §1119(c)(1) NCLB §2123(a)(2)(B) CFR §200.58-200.61
2) Compliance with parental involvement requirements	NCLB §1118(a)-(h) NCLB §1111(c)(14) NCLB §1111(d) NCLB §1116(a)(1)(D)
3) Compliance with school improvement requirements	NCLB §1116(b)(1)(B) NCLB §1116(b)(3) NCLB §1116(b)(4)-(6) NCLB §1116(b)(7)(C)(ii) NCLB §1116(b)(14)(B) NCLB §1116(c)(9) NCLB §1116(c)(10)(B)(iii) CFR §200.36-200.43
4) Compliance with LEA improvement requirements	NCLB §1116(c)(7)
5) Compliance with schoolwide program requirements	NCLB §1114 CFR 200.26-200.28
6) Compliance with targeted assistance program requirements	NCLB §1115
7) Compliance with equitable services to private school students requirements	NCLB §1120
8) Compliance with statutory set-aside requirements	NCLB §1113 NCLB §1116 NCLB §1118

9) Compliance with supplement, not supplant requirements	NCLB §1120A
10) Compliance with financial management/procurement requirements	EDGAR §80.20 EDGAR §80.36
11) Compliance with compensation for personnel services requirements	OMB Circular A-87, Attachment B, Section 8
12) Compliance with complaint procedures	Subpart F—Complaint Procedure (CFR, Title 34)
13) Compliance with equipment and technology requirements	EDGAR §80.32 OMB Circular A-87

During the on-site visit, IDOE spent time interviewing staff from Greater Clark County Schools at their central office. In addition, IDOE visited Parkwood and Spring Hill Elementary Schools, where interviews were conducted with the principal and Title I staff.

IDOE also reviewed documents from Greater Clark County Schools, including district policies and procedures, district notices to parents, district plans, school plans, personnel information, budget documents, contracts, and expenditure reports.

Based on the above information, our report follows.

Monitoring Topic 1: Compliance with NCLB Professional Qualification Requirements for Teachers and Paraprofessionals; Compliance with Comparability Requirements

Background

IDOE interviewed the Title I and Title II Administrators, school principals, and Title I staff regarding professional qualification requirements and compliance with comparability.

Statutory Requirement: Professional qualifications requirements are contained in Sections 1111 and 1119 of Title I. In addition, “highly qualified” is defined in Section 9101(23) of the general provisions section of NCLB and comparability requirements are in Section 1120A(c).

Areas of Compliance

Professional Qualification Requirements: Greater Clark County Schools provided evidence that all core academic teachers and instructional paraprofessionals meet the highly qualified requirements, based on a random sampling of teachers and paraprofessionals from Title I schools.

Paraprofessional Requirements: Greater Clark County Schools provided evidence that instructional paraprofessionals work under the direct supervision of a certified teacher.

Comparability Reporting: Greater Clark County Schools provided evidence that a comparability report was completed for the 2009-2010 school year. Supporting documentation, such as teacher rosters were made available during the visit.

Parents’ Right to Know Regarding Request for Teacher Qualifications: Greater Clark County Schools provided evidence that the Parents’ Right to Know letter was distributed to all students in Title I buildings. A copy is also available on the district’s website.

Parents’ Right to Know Regarding a Non-Highly Qualified Teacher: Greater Clark County Schools provided evidence that a letter was mailed to parents in October 2009 regarding a non-highly qualified teacher assigned to a classroom for 4 or more consecutive weeks. (See Other Matters.)

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1

There are no findings for Topic #1.

Other Matters

Professional Qualification Requirements: Greater Clark County Schools had one out of state teacher who was awaiting licensure in Indiana. The school notified parents and the teacher has since obtained her Indiana Teaching License.

Monitoring Topic 2: Compliance with Parental Involvement Requirements

Background

IDOE interviewed the Title I and Title II Administrators, school principals, and Title I staff regarding parental involvement requirements. In addition, IDOE reviewed policies, compacts, and other documentation provided prior to and during the on-site visit.

Statutory Requirement: Parental involvement requirements are contained throughout Title I, specifically in Sections 1111, 1116, and 1118. In addition, parental involvement is defined in Section 9101(23) of the general provisions section of NCLB.

Area of Strength

Building Capacity for Parental Involvement: Greater Clark County Schools provided evidence that programs, activities, and opportunities are offered to parents to help them understand more about their child's school and academic programs.

Opportunities offered at Title I schools include activities such as Six Pack Saturdays in collaboration with IU East, Kindergarten Camp, 3-2-1 Read, visiting a dental school at the University of Louisville for dental care, and monthly cookouts with families.

Greater Clark County Schools makes information regarding Title I easily accessible on their website at http://www.gcs.k12.in.us/content.asp?q_areaprimaryid=6&q_areasecondaryid=127.

Areas of Compliance

LEA Parental Involvement Policy: Greater Clark County Schools provided evidence of a district parental involvement policy that included all statutory components. The policy was developed or revised with parental input, as required in NCLB, and there was evidence of distribution to parents. A copy of the policy is available on the district's website.

School Parental Involvement Policy: Greater Clark County Schools provided evidence of parental involvement policies for both Parkwood and Spring Hill Elementary Schools that included all statutory components. Policies were developed or revised with Title I parental input and distributed to parents. Copies of policies are available on the district's website.

School-Parent Compact: Greater Clark County Schools provided evidence of a school-parent compact for both Parkwood and Spring Hill Elementary Schools that

included all statutory components. Additionally, there was involvement of parents with the development/revision or evidence of distribution. Copies of the compacts are available on the district's website.

Annual Meeting: Greater Clark County Schools showed evidence both Title I schools held annual meetings for Title I parents during fall 2009.

Reviews Effectiveness of Parental Involvement Activities: Greater Clark County Schools provided evidence that parental involvement activities are reviewed for effectiveness. Parents are regularly asked to complete evaluations and provide feedback on the activities.

Parent Information Resource Center (PIRC): Greater Clark County Schools showed evidence of PIRC information being available to parents both through their website and through school newsletters.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2

There are no findings for Topic #2.

Monitoring Topic 3: Compliance with school improvement, corrective action, restructuring, and alternative governance requirements; including proper implementation of public school Choice and Supplemental Educational Services.

Background

IDOE interviewed the Title I and Title II Administrators, school principals, and Title I staff regarding school improvement issues.

Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116. Depending on the number of years a school has not made adequate yearly progress (AYP), the school, district, and in certain cases state, must take certain actions.

Areas of Compliance

School Improvement Plan: Greater Clark County Schools provided evidence that Parkwood Elementary School had a school improvement/schoolwide plan that contained all statutory components. The current plan, along with revisions, is available on the district's website.

The LEA also provided evidence that parents were involved with the revision of the plan and that it formally approved the plan.

Notification to Parents: Greater Clark County Schools provided evidence that letters regarding school improvement status were mailed to all parents at identified schools in the June 2009. Follow-up Supplemental Educational Service notification letters were mailed in September 2009. Both sets of letters were sent in both English and Spanish.

Technical Assistance and Implementation of School Improvement Plan: Greater Clark County Schools provided evidence that schools identified for improvement are provided on-going technical assistance with implementation of the school improvement plan. This occurs several ways, such as with the Title I Program Administrator providing guidance to Title I school and staff and contracting with an outside provider to monitor implementation.

Public School Choice: Greater Clark County Schools provided evidence that it implemented Public School Choice. Records were kept indicating parents' choices, transfers granted, and funds that were expended for Choice. Information on past Choice expenditures and participation rates are available on the district's website.

Supplemental Educational Services (SES): Greater Clark County Schools provided evidence that it is implementing SES properly. This includes notifying parents of providers (Fall 2009), identifying eligible students (including a second indicator of academic performance per Indiana's Differentiated Accountability Model), and developing contracts and agreements with providers.

Services for the current school year began in November 2009. The current provider list and enrollment information is available on the district's website. Information on past SES expenditures and participation rates are also available on the district's website.

The LEA has developed a tracking system indicating provider enrollment and billing information, and funds expended for SES.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 3

Peer Review: Greater Clark County Schools provided evidence that school improvement plans were reviewed for identified schools, but not within 45 days per NCLB §1116(b)(3)(E).

Required Action: Greater Clark County Schools must ensure that peer reviews for 2010-2011 school improvement plans will be executed within the 45 day time limit.

Monitoring Topic 4: Compliance with District Improvement Requirements

Background

IDOE interviewed the Title I and Title II Administrators, school principals, and Title I staff regarding district improvement requirements.

Statutory Requirement: District (local educational agency) improvement requirements are contained in §1116(c).

Areas of Compliance

Notification to Parents: Greater Clark County Schools provided evidence that the LEA notified parents of its improvement status in June 2009.

LEA Plan Implementation: Greater Clark County Schools provided evidence that the LEA improvement plan is being implemented and monitored, which includes major emphasis on curriculum mapping. Consensus maps were developed in 2008-2009 in both Language Arts and Math. The LEA has also created leadership teams at schools and a District Curriculum Council to provide both leadership and information to all schools within the district.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 4

There are no findings for Topic #4.

Monitoring Topic 5: Compliance with Schoolwide Program Requirements

Background

IDOE interviewed the Title I and Title II Administrators, school principals, and Title I staff regarding schoolwide program requirements.

Statutory Requirement: The schoolwide program requirements are contained in Section 1114. In general, in an eligible schoolwide program school federal, state, and local funds can be combined to upgrade the entire educational program (except Reading First funds). Unlike a targeted assistance school, where certain students must be identified for Title I services, in a schoolwide program school all students are considered to be eligible for services and the goal is to upgrade the entire educational program of the school. In addition, in a schoolwide school, schools are not required to maintain separate fiscal records, by program, that identify activities supported with particular funds as long as the school maintains records that demonstrate that the schoolwide program, as a whole, addresses the intent and purposes of each Federal program that was consolidated.

Areas of Compliance

Schoolwide Plans: Greater Clark County Schools provided evidence that schoolwide plans for both Parkwood and Springhill Elementary Schools contained all required components. Current plans, along with revisions, are available on the district's website.

Additionally, both plans were revised with parental input, and are monitored on a regular and frequent basis.

LEA Guidance to Schools: Greater Clark County Schools provided evidence of guidance to schools regarding the development or implementation of schoolwide plans.

Evaluation of Schoolwide Programs: Greater Clark County Schools provided evidence that evaluations of the programs were conducted regularly.

Focus on Student Learning: Greater Clark County Schools provided evidence that schoolwide programs are focused on student learning. Schools are assigned a Title I Interventionalist, who provides direct instruction to students in small groups (including ESL), works with teachers to support classroom learning, and communicates regularly with parents. Additional staff works with at-risk students in small groups on a daily basis.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 5

There are no findings for Topic #5.

Monitoring Topic 6: Compliance with Targeted Assistance Program Requirements

Background

IDOE interviewed the Title I and Title II Administrators regarding targeted assistance school program requirements.

Statutory Requirement: The targeted assistance program requirements are contained in Section 1115. In a targeted assistance school, a school must maintain a list of eligible children who receive Title I services. Eligible children are children identified by the school as failing, or most at risk of failing, to meet the State's challenging student academic achievement standards.

Areas of Compliance

Targeted Assistance Program: Greater Clark County Schools provided evidence that Title I program resources are used to help participating students meet the state's academic achievement standards. Scientifically-based research strategies and focused learning lessons are used in Title I instruction. Title I staff has a fixed schedule of daily responsibilities.

The LEA also provided evidence that guidance for implementing a Targeted Assistance Program is provided to schools and monitored regularly.

Coordination and Integration of Staff: Greater Clark County Schools was able to demonstrate that the Title I staff coordinate with classroom teachers and are involved in the same professional development opportunities.

Student Selection: Greater Clark County Schools used multiple, educationally related criteria such as ISTEP+, MClass, and Acuity to identify the students who are most academically at-risk.

Focus on Student Learning: Greater Clark County Schools provided evidence that a variety of instructional strategies are used to reach the diverse needs of student learners. Title I Interventionalists provide direct instruction to small groups of students on a daily basis. Other intervention programs include Reading Recovery, literacy groups, Voyager, or Early Success.

Evaluation of Targeted Assistance Programs: Greater Clark County Schools provided evidence that evaluations of the programs were conducted regularly.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 6

There are no findings for Topic #6.

Monitoring Topic 7: Compliance with Equitable Services to Private School Students Requirements

Background

IDOE interviewed the Title I and Title II Administrators and the Title I nonpublic school teacher regarding compliance with nonpublic requirements. IDOE also spoke with the nonpublic principal via telephone.

Statutory Requirements: The equitable services requirements are contained in Section 1120.

Areas of Compliance

Student Selection: Greater Clark County Schools provided evidence that appropriate criteria was used to identify eligible students for Title I services.

The LEA provided evidence of a process to determine that nonpublic school students were identified as both residentially eligible and in academic need.

Equitable Services: Greater Clark County Schools provided evidence of equitable services to the nonpublic school. Services were determined through the consultation with the nonpublic official and the Title I program administrator.

Consultation with Non-Public Officials: Greater Clark County Schools provided evidence that timely and meaningful consultation took place between the district and nonpublic schools. The LEA met with the participating school at the beginning of this year to identify eligible students and develop a program. The LEA also met throughout the year and at the end of the 2008-2009 school year to review student progress and review the effectiveness of the program.

Administration of Non-Public Program: Greater Clark County Schools provided evidence that it maintains control of the Title I program at the nonpublic school, including hiring staff and monitoring and approving all expenditures.

Evaluation of Program: Greater Clark County Schools provided evidence that Title I students at the nonpublic school are evaluated regularly using assessments such as ISTEP+, report cards, and pre-post assessments from the reading or math series.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 7

There are no findings for Topic #7.

Monitoring Topic 8: Compliance with Statutory Set-aside Requirements

Background

IDOE interviewed the Title I and Title II Administrators and the Treasurer regarding the Title I statutory set-aside requirements. Fiscal documents were reviewed prior to and during the onsite visit.

Statutory Requirements: The statutory set-aside requirements are contained throughout Title I, including required reservations for neglected and delinquent children; homeless children, public school choice, supplemental educational services, school improvement, parental involvement and professional development (see Sections 1113, 1116, and 1118).

Areas of Compliance

Homeless Students: Greater Clark County Schools provided evidence that it annually reserves funds for homeless students, but has not expended any funds in recent years.

20 Percent Choice and Supplemental Educational Services: Greater Clark County Schools provided evidence of expending funds for Choice-related transportation costs and Supplemental Educational Services in 2008-2009. The LEA was required to reserve an amount up to \$473,133.86 (20% of its 2007-2008 final allocation) of which it budgeted \$311,501.25.

1 Percent Parental Involvement: Greater Clark County Schools provided evidence of expending funds for parental involvement in 2008-2009. The LEA was required to set aside \$37,121.89 (which included carryover funds from 2007-2008 and a nonpublic proportionate share), of which it met or exceeded that amount.

10 Percent Professional Development for Local Educational Agency (LEA) Improvement: Greater Clark County Schools provided evidence of expending funds for LEA professional development in 2008-2009. The LEA was required to reserve \$236,566.93, of which it met or exceeded that amount.

10 Percent Professional Development for School Improvement: Greater Clark County Schools provided evidence of expending the full 10% for professional development at schools identified for improvement in 2008-2009.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 8

There are no findings for Topic #8.

**Monitoring Topic 9:
Compliance with Supplement, not Supplant**

Background

IDOE interviewed the Title I and Title II Administrators and the Treasurer regarding the Title I supplement, not supplant requirements. Fiscal documents were reviewed during the onsite visit.

Statutory Requirement: Section 1120A requires Title I funds to supplement, not supplant non-Federal sources of funds.

Area of Compliance

LEA Guidance to Schools on Supplement, not Supplant: Greater Clark County Schools provided evidence that guidance is provided to Title I schools regarding the supplement, not supplant rule.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 9

There are no findings for Topic #9.

**Monitoring Topic 10:
Compliance with Financial Management/Procurement Requirements**

Background

IDOE interviewed the Title I and Title II Administrators and the Treasurer regarding the financial management system.

Regulatory Requirement: Section 80.20 (b)-(i) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements financial management systems for non-State grantees (such as school districts).

Areas of Compliance

Process for Internal Control: Greater Clark County Schools provided evidence it has a process for internal control. This process includes ensuring that all purchase orders

are approved prior to purchase and signed off on after receiving materials. Expenditures are appropriately coded to the correct program.

Audit Findings: Greater Clark County Schools did not have any audit findings from Indiana State Board of Accounts.

Expenditures are Reasonable, Allocable, and Necessary: Greater Clark County Schools provided evidence that all 2008-2009 purchases met the requirements for reasonable, allocable, and necessary.

Maintenance of Effort: Greater Clark County Schools met Maintenance of Effort for fiscal year 2009.

Finding of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 10

Contracted Services: Greater Clark County Schools provided evidence that contracts met all required EDGAR components, but lacked specific details of provider expectations

Recommendation: IDOE recommends that contracts be stated more specifically and explicitly to better meet the requirements of EDGAR.

Monitoring Topic 11: Compliance with Compensation for Personnel Services Requirements

Background

IDOE interviewed the Title I and Title II Administrators and the Treasurer regarding compensation for personnel services requirements.

Circular Requirement: OMB Circular A-87, Attachment B, Section 8 details the requirements for all compensation for personnel services supported with federal funds. This section includes the time distribution and semi-annual certification requirements.

Area of Compliance

Compensation for Personnel Services Requirements (Semi-annual Certification and Program Activity Reports): Greater Clark County Schools provided evidence that it was in compliance with the requirements of OMB Circular A-87, Attachment B, Section 8.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 11

There are no findings for Topic #11.

Monitoring Topic 12: Compliance with Complaint Procedures

Background

IDOE interviewed the Title I and Title II Administrators and Treasurer regarding the complaint process.

Area of Compliance

Complaint Process: Greater Clark County Schools provided evidence of a district complaint procedure policy. No complaints have been filed.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 12

There are no findings for Topic #12.

Monitoring Topic 13: Compliance with Equipment and Technology Requirements (OMB A-87 and EDGAR 80.36)

Background

IDOE interviewed the Title I and Title II Administrators, the Treasurer, and the Title I building principal regarding equipment acquired with Title I, Part A funds.

Regulatory Requirement: Section 80.36 of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements for the use, management and disposition of equipment acquired with federal funds by non-State grantees (such as school districts).

Area of Compliance

Disposition of Equipment: Greater Clark County Schools did not provide evidence that there was a policy regarding the disposition of equipment.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 13

Inventory List: Greater Clark County Schools provided evidence that the equipment list contains all components required by EDGAR.

Recommendation: IDOE recommends keeping one master list of all Title I equipment, rather than keeping individual school lists.